

EXHIBIT 11

Geyer, Kate

From: Paige Stradley <PStradley@MerchantGould.com>
Sent: Wednesday, March 26, 2025 2:50 PM
To: Geyer, Kate; RothschildMGTeam
Cc: Machleidt, Dario; Damitio, Chris
Subject: RE: Valve v. Rothschild: Defendants' Missed ESI Disclosure Deadline

****CAUTION: External Email****

Kate,

We disagree with Valve's interpretation of the ESI Agreement (Dkt. 51) as requiring serial disclosures of search terms for each set of document requests. Regardless, for those categories of documents that Defendants agree to produce responsive to Valve's second set of document requests, Defendants will be gathering the categories of requested documents through the use of the search terms that the parties have already agreed upon in addition to doing a targeted collection of documents responsive to Valve's requests (i.e., collection without the use of search terms).

Thank you,
Paige

Paige Stradley
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Operating as Merchant & Gould, LLP, in California.

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From: Geyer, Kate <KGeyer@ktslaw.com>
Sent: Monday, March 24, 2025 9:24 PM
To: RothschildMGTeam <RothschildMGTeam@MerchantGould.com>
Cc: Machleidt, Dario <dmachleidt@ktslaw.com>; Damitio, Chris <CDamitio@ktslaw.com>
Subject: Valve v. Rothschild: Defendants' Missed ESI Disclosure Deadline

CAUTION - External.

Counsel:

Defendants have yet again missed their Court-ordered deadline to provide ESI search methodology disclosures in response to Valve's second set of discovery, including additional search terms for custodial sources. The ESI Order makes it clear that Defendants must disclose their search methodology, *including search terms*, 14 days after receiving discovery requests. Dkt. 51, Section C.2.a.i. Valve served its second set of discovery on March 4, 2025. Defendants' ESI disclosures were due March 18. This is the second time that Defendants have missed this same deadline, despite the fact that we already warned you about this numerous times in the past. Defendants' discovery failures have extended far beyond negligence and now appear to be in bad faith.



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